

EXHIBIT 6

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12 Attorneys for Plaintiff
13 VERIGY US, INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VERIGY US, INC, a Delaware Corporation

Case No.

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual; SILICON
TEST SYSTEMS, INC., a California Corporation;
and SILICON TEST SOLUTIONS, LLC, a
California Limited Liability Corporation,
inclusive,

DECLARATION OF ANDREW N. LEE
IN SUPPORT OF PLAINTIFF'S
EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER
TO SHOW CAUSE RE PRELIMINARY
INJUNCTION

Defendants.

REDACTED PUBLIC VERSION OF

HIGHLY CONFIDENTIAL

ATTORNEYS EYES ONLY

DOCUMENT SUBMITTED UNDER SEAL

1 I, Andrew N. Lee, declare as follows:

2 1. I make this declaration of my personal knowledge and, if called as a witness, I
3 could and would testify competently to the facts set forth herein.

4 2. I am the Strategic Commodity Development Manager at Plaintiff Verigy US, Inc.
5 ("Verigy"). Prior to the spin off of Verigy from its predecessor in interest, Agilent Technologies
6 Inc, in June 2006, I served in the same position at Agilent from approximately May 2001. As the
7 Strategic Commodity Development Manager at Agilent and Verigy, I was responsible for
8 procurement activities related to critical parts and components used in Agilent's and Verigy's
9 semiconductor test equipment, including procurement of internally designed application-specific
10 integrated circuits ("ASICS").

11 3. I began supervising the RFQ process in late 2001 or early 2002, which is when I
12 first created a general confidential Request for Quotation ("RFQ") document for the company.
13 The RFQ document is used to solicit price quotes and other technical information from design and
14 manufacturing companies for their design and/or manufacturing services for our integrated circuits
15 under design. I created the RFQ document [REDACTED]

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]

20 4. I consider this RFQ document to be a confidential, proprietary and trade secret
21 Verigy document that is the product of years of research and experience. I only disclose RFQ's to
22 prospective suppliers of design and/or manufacturing services related to specific integrated
23 circuits, and only such prospective suppliers have signed a non-disclosure agreement.

24 5. When seeking a quotation with respect to a specific integrated circuit, [REDACTED]
25 [REDACTED]
26 [REDACTED] In addition to the RFQ itself,
27 the technical details of each integrated circuit for which we are seeking a quotation are also
28

1 confidential and proprietary, as they describe the technical details of potential products that would
2 allow our competitors would gain an advantage if the documents were released.

3 6. In April and May 2006, I worked with Romi Omar Mayder ("Mayder") on an RFQ
4 for

5
6
7 This document included a

8 Mayder emailed several versions of
9 and the third and final version is what was included in the RFQ that went to
10 Attached hereto as Exhibit A is a true and correct copy of my May 5, 2006 email

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12 7.

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14 8.

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16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct.

18 Executed this 16th day of August, 2007 in Monument, Colorado.

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20 Andrew N. Lee
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Andrew N. Lee

EXHIBIT A

EXHIBITS FILED UNDER SEAL

EXHIBIT B

EXHIBITS FILED UNDER SEAL

EXHIBIT C

EXHIBITS FILED UNDER SEAL